

III. REMARKS

In the Office Action, Claims 1, 2 and 4-17 were rejected under 35 U.S.C. 112, first paragraph, for failure to recite a mobile subscriber identification number, as explained in the Office Action. Claims 4-6 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for referring to canceled claim 3. The rejection under 35 U.S.C. 112, second paragraph, is overcome in this response by making each of claims 4-6 depend from claim 1.

Claims 1, 2, 4, 5, 7-9, 11 and 14-16 were rejected again under 35 U.S.C. 102 as being anticipated by Tayloe (US 5,933,785) for reasons set forth in the Action. Claims 6, 10, 12 and 13 were rejected again under 35 U.S.C. 103 as being unpatentable over Tayloe in view of the article by Lammerts, and claim 17 was rejected under 35 U.S.C. 103 as being unpatentable over Tayloe in view of Imura (US 6,513,719) for reasons set forth in the Action.

The independent claims are amended to overcome the foregoing grounds of rejection. In the amendments to claims 1 and 11, means-plus-function language has been modified by replacement of the means by the corresponding structure, namely, memory and/or processor, which are disclosed in the specification. On page 1 at line 22, the specification teaches that the SIM card has a processor, and on page 24, at lines 24 and 27, the specification teaches that the SIM card has a memory.

The following argument is believed to overcome the rejections under 35 U.S.C. 102 and 103, in view of the foregoing amendments, so as to show the presence of allowable subject matter in the claims.

With respect to the rejection of Claims 1, 2 and 4-17 under 35 U.S.C. 112, first paragraph (page 2 of the Action) because of insufficient disclosure which concerns an IMSI definition, the independent claims 1, 11 and 14 are amended to overcome this ground of rejection by replacing the reference to IMS1 with language relating to ITSI.

With respect to the rejections under 35 U.S.C. 102 and 103 based on Tayloe considered alone and in combination with Lammerts, the following is noted. The anticipation rejections of the independent claims 1, 11 and 14 on Tayloe are traversed as follows. It is urged that Tayloe does not teach a SIM card dealing with several user PIN codes. Only one user PIN code is disclosed.

Starting the reading on column 2 line 59: "A user inserts a SIM card into the SIM card reader contained within the radiotelephone. Upon insertion of the SIM card, the radiotelephone prompts the user through the user interface to insert a personal identification number (PIN) to unlock the SIM card allowing access to the subscriber information contained therein". After that, the SIM card of Tayloe is capable of receiving calls from several "universal numbers" which can belong to one or several users (column 3 at lines 3-7 and lines 39-49). Tayloe does not disclose that every "universal number" should need its own PIN code or that different users should have their own PIN codes. The cited part of the description (column 3 at lines 39-45) speaks only about "universal numbers" (public telephone numbers) which can not be equated with PIN codes (secret passwords of the users).

The "additional PIN code", upon which the Examiner relies, is mentioned on column 5 lines 55-59. However, this PIN code has a special function in the system of Tayloe. It is used only when a new "universal number" of Tayloe, permanent or temporary, is activated to the SIM card after login (i.e. after the use of "ordinary" PIN). This "additional PIN code" cannot be used in place of an "ordinary" PIN code that is used during login process.

Based on the foregoing observations, it is urged that Tayloe does not disclose a different user PIN (i.e. personal identification code) for each allowable user. Therefore all of the independent claims, as amended, are distinguishable from Tayloe.

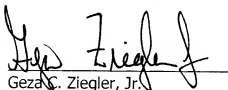
With respect to the rejection of Claims 6, 10, 12 and 13 as being obvious over Tayloe in view of the publication of E. Lammerts (Realization of a mobile data application in TETRA) and US 6513719 (Imamura), the following is noted.

In the section "Response to the arguments" the Examiner argues that Tayloe is capable of performing the intended use depicted in the present claims. The above-mentioned arguments show that the terminal of Tayloe can not be used in an environment where the one and same SIM card allows different users to log in using different PIN codes.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



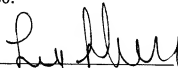
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